

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF MARYLAND

3 TIMOTHY BROWN,

4 Plaintiff,

5 v.

Case No.: 23-CV-155 GLR

6 MAYOR AND CITY COUNCIL OF
7 BALTIMORE CITY, et al.,

8 Defendants.
9 -----

10 DEPOSITION OF TIMOTHY BROWN, JR.

11 Baltimore, Maryland

12 Friday, May 23, 2025

13 1:04 p.m.
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18

19 Job No.: 108697

20 Pages: 1 - 135

21 Reported by: Sheri D. Hayhurst-Smith, Court Reporter

1 DEPOSITION OF TIMOTHY BROWN, JR., held at:

2
3 KRAMON & GRAHAM, P.A.

4 750 East Pratt Street

5 Suite 1100

6 Baltimore, Maryland 21202
7
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9

10 Pursuant to Notice, before Sheri
11 Hayhurst-Smith, Court Reporter and Notary Public in
12 and for the State of Maryland.
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A P P E A R A N C E S

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(Appearances continued on the next page.)

A P P E A R A N C E S

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C O N T E N T S

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1 TIMOTHY BROWN, JR., having been sworn,
2 testified as follows:

3 EXAMINATION

4 BY MR. JEFFRIES:

5 Q Good afternoon, sir. Could you please
6 state your full name for the record.

7 A Timothy Brown, Jr.

8 Q And, Mr. Brown, good afternoon. My name
9 is Chris Jeffries. We met informally off the
10 record, but I'll introduce myself to you on the
11 record, okay?

12 A Yes, sir.

13 Q I represent a number of the defendants in
14 the case that you filed your lawsuit for, okay. I
15 represent Keith Gladstone, Michael O'Sullivan,
16 Kenneth Patzman, Avraham Tasher, and Antonio
17 Saunders, okay?

18 A Yes, sir.

19 Q Have you ever given a deposition before?

20 A No, sir.

21 Q All right. Let me go through a couple of

1 the ground rules with you, okay.

2 So, there's a court reporter sitting to my
3 right and your left, and she's taking down
4 everything we say, okay?

5 **A Yes, sir.**

6 Q Because she's taking down everything we
7 say, it's very important that only one person talks
8 at a time; is that okay?

9 **A (The witness nods head up and down) .**

10 Q And here's the next rule. She can't take
11 down a shake of the head, uh-huh or an huh-huh,
12 okay?

13 **A Yes, sir.**

14 Q So, it's very important that you give
15 verbal responses, okay?

16 **A Yes, sir.**

17 Q This isn't a memory test. If you don't
18 know the answer to any of one my questions,
19 obviously, you tell me that you don't know the
20 answer, okay?

21 **A Yes, sir.**

1 Q As we're going through, if you don't
2 understand one of my questions, please tell me --
3 it's my fault, I'm sure -- and I'll rephrase it,
4 okay?

5 A **Yes, sir.**

6 Q If you do begin to answer my question, two
7 things are going to flow with that, okay. The first
8 is that you understand the question, and the second
9 is that you're able to answer truthfully because
10 you're under oath to do that, okay?

11 A **Yes, sir.**

12 Q If you need a break, just say so. I don't
13 think this is going to be terribly long, but if you
14 need a break, we can take one. The only thing that
15 I ask is that if I'm in the process of asking a
16 question, let me finish asking it. And if you're in
17 the process of answering a question, please finish
18 answering it, and then we can take a break if we
19 need to?

20 A **Yes, sir.**

21 Q Mr. Brown, what is your date of birth?

1 **A 8/15/1985.**

2 **Q Have you ever gone by any other name?**

3 **A You're talking about Epperson?**

4 **Q Is that E-P-P-E-R-S-O-N?**

5 **A Yes.**

6 **Q Any others?**

7 **A Not to my knowledge.**

8 **Q How about any nicknames?**

9 **A None.**

10 **Q Never?**

11 **A No. Tim.**

12 **Q Tim. Any other last names?**

13 **A No. I used an alias in my time.**

14 **Q And what was that alias?**

15 **A The one I just gave you, that's my little**
16 **brother's name.**

17 **Q Got it. And you said you used that for a**
18 **period of time?**

19 **A No. Not a period of time. I used it**
20 **before as an alias.**

21 **Q When have you used it before as an alias?**

1 A I can't recollect what day it was.

2 Q Sure. Can you give me an idea of the year
3 maybe?

4 A I'll probably say within probably the
5 2000s, 2000 and probably something. I'm not for
6 sure. I can't tell you specifically what day or
7 what time. I just know it was in the 2000s. I was
8 arrested. And not knowing how to use my brain, I'm
9 thinking, oh, if I get me a different name, it's
10 going to make a difference. It doesn't. These tell
11 you, (indicating).

12 Q Okay. Do you recall what the arrest was
13 for?

14 A Not -- I was -- are you talking about as
15 far as what I got locked up for? I'm not for sure.
16 I mean, it could have been for a lot of things --
17 like if it was for jaywalking -- because I don't
18 remember.

19 Q Have you used the Epperson alias more than
20 once?

21 A Probably so.

1 Q Can you give me an idea of how many times
2 you used it?

3 A I can't really tell you. That would be
4 lying if I tell you one of if I tell you ten. I
5 just know that I used it more than one time, and it
6 didn't work out for me. So, I stopped doing that.

7 Q And what was the context -- was it the
8 same context in which you used it every time?

9 A More than likely, probably a different
10 birthday or something, but that name, that's what I
11 had done more than once. Like I get arrested, "oh,
12 my name is June Bug," and they be like "all right,
13 your name is June Bug, cool." They get me down to
14 the district to take my fingerprints, "oh, your name
15 is Timothy Brown, AKA June Bug." Yes.

16 Q My question is a little bit different.
17 So, let me repeat it, but I think I'm following you.

18 The only time you used an alias is in the
19 context of being arrested; is that fair?

20 A Yes.

21 Q And you used the same alias but a number

1 of times?

2 A I know I used it more than one time. I'm
3 not going to say a number of times. But, yeah, I
4 know I used it more than once.

5 Q I don't mean anything by it. I ask the
6 question of every witness.

7 A Yes, sir.

8 Q Are you currently under the influence of
9 anything that would impact your ability to testify
10 truthfully today?

11 A No, sir.

12 Q Did you do anything to prepare for this
13 deposition?

14 A No. I didn't even -- I mean, this is my
15 first time I've ever handled one of these
16 depositions. That's why I asked --

17 Q I'm not -- hold on. I'm not asking you --

18 A No. No.

19 MR. HANSEL: He means other than
20 anything -- he's not asking you in this
21 question about anything you and I discussed.

1 MR. JEFFRIES: Correct.

2 MR. HANSEL: Did you do anything else?

3 MR. JEFFRIES: Correct.

4 THE WITNESS: No.

5 BY MR. JEFFRIES:

6 Q I'm assuming you spoke with Counsel?

7 MR. HANSEL: Don't answer.

8 MR. JEFFRIES: To be clear, that was a yes
9 or no question. I'm not asking a comment.

10 MR. HANSEL: You can say "yes" to that, if
11 that's accurate.

12 THE WITNESS: Yes.

13 BY MR. JEFFRIES:

14 Q So, you didn't review any documents in
15 preparation for your deposition?

16 A No.

17 Q Have you reviewed the complaint that was
18 filed on your behalf in this case?

19 A What, like read over it?

20 Q Yes.

21 A I've read over a few things that they sent

1 to, like my e-mail and stuff like, as far as what's
2 going on or whatever. But, no, I didn't really go
3 into like details with nobody.

4 Q Let me show you -- we can mark it, if we
5 need to, but I'm going to represent to you this is a
6 copy of the amended complaint that was filed on your
7 behalf in this case, okay?

8 A Okay.

9 Q I'm not asking you if you've seen that
10 specific document before, but I'm going to ask you
11 if you think you've seen a copy of the amended
12 complaint before, and if you reviewed it, okay?

13 MR. HANSEL: You can take a look at it.

14 MR. JEFFRIES: Take a look at the document
15 so you can answer.

16 MR. HANSEL: Do you have one for me?

17 MR. JEFFRIES: Yeah, absolutely.

18 MR. HANSEL: Whatever your memory is, let
19 him know.

20 THE WITNESS: If you all sent it to me, I
21 don't think -- I'm not going to say yeah, I sat

1 there and read over it and analyzed it.

2 BY MR. JEFFRIES:

3 Q I want us to be clear. I wouldn't have
4 sent it to you, and I'm not asking about his
5 communications.

6 But I want to know that is the amended
7 complaint that was filed in this case?

8 A **Yeah. I don't think I've ever seen this.**

9 Q Other than attorneys or people from
10 attorneys' offices, who have you spoken with about
11 this case?

12 A **Nobody.**

13 Q Nobody? This case comes from an arrest
14 that occurred in 2014, right?

15 A **Yes, sir.**

16 Q Other than attorneys or people from --

17 MR. HANSEL: Yeah. Yeah. You can -- I'm
18 sorry. I don't mean to interrupt your
19 questions. Whenever you feel like you need to
20 drink some water, drink some water. If you get
21 to a point where you need a break, just as long

1 as there's not a question pending, just let
2 everybody know.

3 THE WITNESS: Yes. Yes.

4 BY MR. JEFFRIES:

5 Q This case arises from the 2014 arrest.

6 Other than attorneys that were representing you
7 or representatives from their office, who have you
8 spoken with about the 2014 arrest?

9 A Only -- I haven't spoken to anybody as far
10 as pertaining to the case, but I had a public
11 defender. And I think that's probably the only one
12 that I have spoken to. But then they really don't
13 really speak to you too much. They just tell you
14 what the offer is.

15 Q So, I'm not asking about any conversations
16 you may have had had with any lawyer.

17 MR. HANSEL: That includes a public
18 defender.

19 A Oh, no. Nobody.

20 Q So, from that, you haven't spoken with
21 your family about the case; is that correct?

1 **A My mother. That's who I live with.**

2 **Q What have you spoken with your mother**
3 **about?**

4 **A I got arrested, and I felt as though I had**
5 **got arrested for something I ain't had nothing to do**
6 **with. And she was like "okay, try to go about**
7 **trying to see if you can get some justice."**

8 **But I haven't spoke to like no friends. I**
9 **don't really have too many friends. I've got one**
10 **brother, and I got another brother that's**
11 **incarcerated. But he's been locked up for years.**
12 **So, I don't really deal with too many people out**
13 **there. My mother is the only person I've got.**

14 **Q Have you had multiple conversations with**
15 **your mother about either the 2014 arrest or the**
16 **lawsuit?**

17 **A No.**

18 **Q Just the one that you just told me about?**

19 **A Yeah. Me and my mother, we talk to each**
20 **other, but it's not like all the stuff like that.**

21 **Q The conversation that you were telling me**

1 about where you said you got arrested -- I'm
2 paraphrasing -- you did say more than that -- can
3 you give me an idea of when that occurred?

4 Was it closer to your arrest or was it closer
5 to when you filed your complaint? Do you understand
6 my question?

7 **A No.**

8 **Q** When did that conversation occur that you
9 just told me about with your mother?

10 **A** With my mother, I guess, after I got home
11 from being arrested, I felt it little bit. But I
12 talked to my mother about all the stuff, nothing too
13 spectacular. But I don't really talk to her about
14 this.

15 **Q** Did you talk to your mother around the
16 time that you were arrested in 2014? About being
17 arrested, not just general?

18 **A** No. My mother is my only person that I
19 have. Like I don't really have -- I have two
20 brothers, but I don't have two brothers, if you
21 probably can understand that. Like my mother is the

1 only person I really got. I don't have no father.
2 My uncles, one of them, no disrespect to their
3 culture -- I have nothing against them -- he's a
4 homosexual. I don't channel my energy to him
5 because of his sexuality, but we really don't have
6 no relationship, if you probably can understand it.

7 So, I don't really got nobody but my mother. I
8 talk to my mother, not about this case, but I ask
9 her to help me. I've been to her when I'm going
10 through stuff, but I don't talk about it.

11 Q Other than one conversation with your
12 mother, did you talk to your mother again about
13 being arrested or this case?

14 A No.

15 Q You told me you were born August 15th of
16 85. Where?

17 A Baltimore, Maryland.

18 Q I gather I know -- what's your marital
19 status?

20 A As far as like being married to somebody?

21 Q Yes.

1 **A Never.**

2 **Q Do you have any children?**

3 **A I have a son; he's 17. And I have a**
4 **daughter, but I don't really have no relationship.**

5 **Q How old is your daughter?**

6 **A Going on 15.**

7 **Q Have you ever had a relationship with**
8 **either your son or daughter?**

9 **A To be truthful, no.**

10 **Q Have either of them ever lived with you?**

11 **A My son did at one point in time.**

12 **Q When was that?**

13 **A Since he was four months.**

14 **Q And how long did he live with you?**

15 **A Until he was six and a half.**

16 **Q And what's your son's name?**

17 **A Amonte Sykes.**

18 **Q Amonte, A-M-O-N-T-E?**

19 **A Yes.**

20 **Q S-Y-K-E-S?**

21 **A Yes. S-Y-K-E-S.**

1 Q And what about your daughter's name?

2 A Taylor, T-A-Y-L-O-R, Brown.

3 Q Brown. And what about your son's mother?

4 Are you close with her?

5 A No.

6 Q Have you ever been?

7 A No.

8 Q After he was born, were you ever?

9 A We ain't really had no relationship, since
10 I wasn't in a relationship with her. So, she kept
11 my daughter from me.

12 Q I'm sorry. I think I was asking you about
13 your son.

14 A Oh, yeah. My son, yeah, we had a
15 relationship. I really couldn't be no real father
16 because I called myself being there for him. But I
17 ain't be no real father.

18 Q What do you mean by that?

19 A Do you want me to elaborate?

20 Q Yes. Just what do you mean?

21 A I just informed that I really wasn't no

1 **real father.**

2 Q Were you close with his mother?

3 A **No. She went on with her life. She's**
4 **married now.**

5 Q She's married now. Okay. And what about
6 with the mother of your daughter?

7 A **I just told you, I don't have no**
8 **relationship. She, I guess, went on with her life,**
9 **too. Excuse me.**

10 Q Sure. How frequently did you see your son
11 or your daughter back in 2014?

12 A **It was around my son -- I took him to**
13 **school, played the role with him as a father. I**
14 **wasn't really financially stable. That's why I had**
15 **my mother. She helped me. When my son's mother**
16 **wasn't there to help me with him. So, my mother**
17 **stepped up.**

18 Q You just mentioned a stepmother?

19 A **My stepmother -- I don't even know my**
20 **father, Bro.**

21 Q I was trying to understand. I didn't hear

1 what you said. I was trying to understand. You
2 mentioned your mother?

3 A I said my mother helped me with my son.
4 She was basically the financial stability. She
5 worked. I went to school and tried to find a way
6 out there, but I ain't really had no money. I ain't
7 really had nothing. My mother was there. She
8 played that role. I just basically watched my son,
9 played with him, whatever, but I really wasn't no
10 real father. I just had a son. What do you want me
11 to tell you?

12 Q I'm just asking the question, okay. Were
13 you working in 2014?

14 A Off and on. I couldn't really hold on to
15 no job.

16 Q Why not?

17 A I ain't give myself the ability to.

18 Q What do you mean by that?

19 A I didn't give myself the ability to. I
20 gave up a lot of times. A lot of stuff in life, I
21 said, "I don't care," and I went on with life being

1 content.

2 Q Can you recall -- you said you were
3 working off and on in 2014?

4 A I worked on off and on. I couldn't keep a
5 job. What more do you want me to keep saying, Bro?

6 Q Where were you working?

7 A McDonald's, Christian Foods, like a few
8 friends that I know that had businesses, under the
9 table will probably let you work or whatever.

10 I couldn't keep a job, Bro. I had a job. A
11 few months go past, something would happen. I won't
12 be working no more.

13 Q For example, if you were working at
14 McDonald's, what happened as to why you weren't
15 working there anymore?

16 A I didn't give myself the ability, sir.
17 What do you want me to go into details, like "oh, I
18 come in there, was late, oh, I come in there and the
19 boss might said something to me, and in my feelings
20 about something that's going on."

21 I couldn't keep a job. Like I keep saying

1 **that, and you want me to --**

2 Q Yeah. Well --

3 A I couldn't keep a job. So, my mother
4 **played the role. My mother helped me and helped my**
5 **son.**

6 MR. HANSEL: Do you remember what it was
7 at McDonald's in particular?

8 THE WITNESS: I was the food clerk, the
9 dude they put on the grill. You know, where
10 they put the dude that don't really got no
11 strong education, ain't been to college. I
12 wasn't the manager or one of them people
13 sitting there doing the paperwork. I was the
14 one on the grill, the one that they keep
15 telling to get the boxes and do this and do
16 that.

17 MR. JEFFRIES: Thank you for that.

18 BY MR. JEFFRIES:

19 Q Do you remember why you stopped working at
20 McDonald's?

21 A I just told you. I didn't apply myself.

1 Like sometimes I go in there, I didn't give it my
2 all. Sometimes I do; sometimes I don't. I come in
3 there, and I tell you the man might say, "All right,
4 get on the grill, and after you get on the grill, go
5 sweep and do this." And I mean might be in my
6 feelings about something. And I might do it, but I
7 might be running my mouth saying something or
8 whatever. And then people not looking at that.

9 Q The McDonald's specifically that you're
10 talking about, do you recall being fired from that
11 job or just -- period? Do you recall being fired
12 from that job?

13 A I've been work at McDonald's for years.
14 My mother has been there over 20 years. My mother
15 is one of the people -- she's my crutch. Like I
16 would get a job or work at McDonald's because she
17 help me get in, and then I mess her name up. I go
18 in there -- excuse my language -- and don't do what
19 I'm supposed to do and put a bad name on my mother.

20 Like what's up, Bro? Why you like going into
21 like my background, Bro? I'm a messed up person,

1 **Bro. I know that.**

2 Q That's not --

3 A That's what you sitting right here doing,
4 asking me stuff. "Oh, you had a job." Yeah, I
5 couldn't hold the job. I might get a job and don't
6 hold on to it, and then go back, and my mother would
7 be my crutch.

8 MR. JEFFRIES: Why don't we take a break
9 for a second. We can go off the record.

10 (A discussion was held off the record).

11 BY MR. JEFFRIES:

12 Q You told me you worked at McDonald's in
13 2014?

14 A **Yes.**

15 Q You told me you stopped working at
16 McDonald's in 2014?

17 A **(The witness nods head up and down).**

18 Q Why did you get fired from that job at
19 McDonald's?

20 A I'm not recalling like my last time
21 working at McDonald's, did I get fired, because I

1 worked at McDonald's for quite a few times. I
2 worked at different ones, but, yes. I think, if I'm
3 not mistaken, I was working at McDonald's, I'm
4 thinking like 13. Yes, I was working at McDonald's,
5 I think, yeah, 13.

6 Q How about in 2014, were you working there?

7 A In 2014, no. 2014, I was going to school.
8 As a matter of fact, I was at driving school at the
9 time.

10 Q Where were you going to school in 2014?

11 A I wasn't -- I'm not like -- I can't really
12 remember exactly. I was in driving school. I was
13 going to driving school at the time.

14 Q For what?

15 A To get my driver's license, my permit. I
16 thought that I can go to driving school, and they
17 would teach you certain things. And that's what I
18 was doing, going to driving school.

19 Q Did you have a Maryland driver's license
20 already?

21 A No. I had an ID.

1 Q So, that's what I'm trying to understand.
2 So, for example, were you trying to get a CDL or
3 were you just trying to get --

4 A No. I was just trying to get a regular
5 driver's license.

6 Q Got it.

7 A So, yeah, I don't think in 14 -- no, I
8 don't think I was working in 14. I think I was
9 working in 13.

10 Q So, to be clear, you don't think you had
11 any job, any work job in 2014?

12 A Not to my knowledge, I don't think so.

13 Q Do you remember the name of the driving
14 school?

15 A EZ Driving School or EZ Driving School,
16 down on Baltimore Street.

17 Q What is your educational background?

18 A I went to the tenth grade. I tried to get
19 my GED, and I started trying to get my GED but
20 didn't really complete everything.

21 Q Where did you attend tenth grade?

1 **A First, I was at Patterson High School.**

2 **Then I was at Harford Institute up on Harford Road.**

3 **Q Did you complete tenth grade?**

4 **A I completed tenth grade, but you might as**
5 **well say it wasn't no effect because after tenth, I**
6 **stopped going.**

7 **Q What year did you complete it?**

8 **A Don't get me lying to you, man. You**
9 **cracking on me now.**

10 **Q No. No. I was trying to --**

11 **Where do you take your GED class?**

12 **A To be truthfully, incarcerated, Roxbury**
13 **Road, because that was a part of my stipulation.**

14 **Q And you said you haven't completed it?**

15 **A What, the GED?**

16 **Q Yes.**

17 **A No. I didn't complete it.**

18 **Q How close are you to completing it?**

19 **A I was supposed to went and took the test.**
20 **I didn't go take it and got released.**

21 **Q When were you released?**

1 A I think it was 19.

2 Q 19, okay. Have you done anything about
3 taking it since 19?

4 A Yeah. I was going to get back in school,
5 but I never took the initiative to do it. I was
6 just being idle.

7 Q Did you finish your answer?

8 A Yeah. I said, "I was just being idle."

9 Q Do you have a Maryland driver's license
10 now?

11 A Yes.

12 Q Do you have any other licenses or
13 certification?

14 A At the moment, I got my forklift
15 certification. I got seven-power industrial
16 machine, Type 40. I went to -- like I got a trade
17 in this little program -- I forgot the name of it.
18 Don't get me lying to you, but it was something they
19 put me in, as far as a little program in Mondawmin.
20 Like I had to go in there and go upstairs.

21 Q Who put you in that program?

1 A Some stipulations, as far as like -- when
2 I first came home, it was stipulations that I had to
3 do, but then I still continued to do them.

4 Q You've been incarcerated more than once,
5 right?

6 A Yes.

7 Q So, you come home. And have you been on
8 parole more than once or probation more than once?

9 A As far as my whole life?

10 Q Yes.

11 A I've been on probation -- I mean parole
12 twice.

13 Q So, as part of your parole -- when you're
14 telling me as one of your stipulations, you had to
15 go to Mondawmin. I'm trying to figure out when that
16 was, if you know?

17 A Right after 19. Like I'm not going to sit
18 here and say specifically what date, but I'm just
19 saying after 19, it was -- like I forgot the name of
20 the program or whatever, but they were saying -- I
21 got a certificate and all that in the house. Like

1 me and my mother was really like -- like my mother
2 sat there with me and took a video and all that.
3 Like I think the mayor was there and all that. It
4 was something that they do.

5 And I got a certification for it, and then I
6 completed their program. My mother was there.

7 Q How long was the program? Do you have an
8 idea?

9 A Don't get me lying to you.

10 Q Do you know what the program was for?

11 A I guess it was to build us up, I guess. I
12 don't know. Don't get me lying to you. They just
13 told me to do it, and I did it.

14 Q What kind of things did you do?

15 A We went in there, and we did stuff. It
16 was like a person that used to sit in there and hold
17 the little groups and stuff. Like they had groups,
18 and they used to -- don't get me to lying to you.
19 Like I can't sit right here and try to give you bits
20 and pieces of it, but then that would be making up
21 something. I just done the program. I went in

1 **there, and I completed it.**

2 Q But you don't remember what it was about?

3 A **No. It was just something that they told**
4 **us we had to do.**

5 Q When did you get your forklift
6 certification?

7 A **When I was incarcerated.**

8 Q Which time or what year?

9 A **From 14 to 19.**

10 Q I'm assuming you don't have an issue
11 reading or writing or understanding English,
12 correct?

13 A **No, sir.**

14 Q Any other licenses or certifications you
15 haven't already told me about?

16 A **Not offhand. I probably had to go and**
17 **look into it, but I did complete a few programs, I**
18 **think at least -- I ain't going to hold you -- at**
19 **least like seven of them.**

20 Q Do you have certifications for all of
21 them?

1 A Some of them had certifications; some of
2 them don't. They were just achievement goals. They
3 give you little, I guess, certificate. That's what
4 they call it.

5 Q And as you're sitting here, you don't
6 remember what all the courses are; is that fair?

7 A No. I ain't going to sit here and lie to
8 you.

9 Q If you would, would you be able to gather
10 what you can and get over to Counsel?

11 MR. HANSEL: We'll produce anything that's
12 responsive. I'll look into it, if there's
13 anything responsive. In fact, even if it's not
14 responsive, in the case of any graduation
15 certificates or certificates, along the lines
16 of what you guys have been discussing, I'll get
17 them together for you, and we'll produce them.
18 I don't have any problems with that.

19 MR. JEFFRIES: I'll appreciate that,
20 Counsel.

21

1 BY MR. JEFFRIES:

2 Q Mr. Brown, what's your current address?

3 A My current address is 2811 Ruscombe Lane,
4 Baltimore, Maryland, 21215.

5 Q For how long has that been your address?

6 A 2006. Now, I'm not going to lie to you.
7 Like I have dealt with a woman or two but --

8 Q You're anticipating my next question,
9 which wasn't going to be about dealing women. But I
10 was going to ask about the other places that you
11 stayed.

12 A Yes. I have stayed a different place or
13 two. I'm not going to say one place; I'm not going
14 to say 50 places. But 2811 is my mailing address.
15 That's my home address. But I have dealt with a
16 woman that got in my brain. The whole time she's
17 using me for what you can get. And then when she
18 can't use me no more, what's next to do? Keep
19 arguing, fussing and cussing and come and get your
20 stuff and leave.

21 MR. HANSEL: Mr. Brown, I'm going to ask

1 you to focus on the questions he's asking,
2 because if you go too far afield, we'll be here
3 until next Tuesday. And I've got plans this
4 week. Are you with me?

5 THE WITNESS: Yes, sir. Sorry.

6 MR. JEFFRIES: That's all right.

7 MR. HANSEL: If he asks you about
8 addresses, just give him addresses.

9 THE WITNESS: Yes, sir.

10 MR. HANSEL: If you sometimes stayed with
11 somebody else, give him that address. If you
12 don't remember, let him know. And we'll move
13 on. Because, otherwise, like I said, my family
14 is going to be mad if I don't show up this
15 weekend.

16 THE WITNESS: That's cool. I apologize.

17 MR. HANSEL: You're doing great, my
18 friend.

19 BY MR. JEFFRIES:

20 Q What were the other addresses where you
21 stayed? And let me just give you a time frame.

1 Let's go between 2013 and 2014 for now.

2 A It had been a few addresses, sir. Like I
3 was just saying, my real address is 2811 Ruscombe
4 Lane. That's where I live at.

5 Q Right.

6 A But if at times, I had moved out -- and
7 not just say moved out -- like say a little homegirl
8 that I had, she was living down Winchester
9 Apartments -- I think that was like 20 something --
10 2013, 14 or some crazy stuff. Don't get me lying to
11 you. I was there for about a couple of months. Got
12 mad and put me out.

13 Q When was that?

14 A Don't get me lying to you.

15 Q Could you give me a year?

16 A I'm not going to lie to you. Like I
17 wasn't just living with the girl just now, but I was
18 going over to her house a couple of nights.

19 Q So, I'm not asking about now. I want to
20 go back and focus on the period of 2013.

21 A Yeah. That's what I'm saying. I can't

1 sit here and tell you exactly what addresses and all
2 that. I just know I had not moved out because my
3 clothes and stuff still was at my mother's, but I
4 had been gone for a couple of days.

5 Q So, we're talking about February of 2014,
6 right? That's when the incident occurred?

7 A Right.

8 Q Is it fair to say that although you used
9 2811 as your permanent address during February of
10 2014, you weren't always staying there. Is that
11 fair?

12 A Yes. That's fair.

13 Q All right. If you weren't always staying
14 at 2811, can you give me the addresses of where you
15 were otherwise staying?

16 A No. I can't give you every exact address,
17 but I can tell you like Winchester Apartments, I
18 don't know exactly what's the name -- what's 2315 or
19 something like that, Apartment 2. I just know I was
20 going down the apartments and spending time down
21 there.

1 Q And that would have been in the beginning
2 of 2014?

3 A Right.

4 Q So, Winchester Apartments is one?

5 A Right.

6 Q Are there other places that you were
7 staying at the beginning of 2014 that you haven't
8 already told me about?

9 A Not offhand. Yeah, I stayed other places,
10 but I don't remember the address or the number or
11 nothing.

12 Q Can you tell me -- can you give me an idea
13 of where they were?

14 A One I was staying with -- well, not
15 staying with -- or not staying there, but I was
16 going over there and chilling a little bit up the
17 street from Harford Road up on Tivoli. But I don't
18 know exactly what --

19 Q That's okay.

20 A That was over east.

21 Q So, we've got 2811, we've got Winchester

1 Apartments. We've got Tivoli. What else that you
2 can remember?

3 A Yeah. A couple of spots. I can't
4 remember. I ain't going to say -- I can't remember
5 every spot.

6 Q Can you remember the neighborhood, a
7 landmark or something?

8 A East Baltimore by like Harford Road.

9 Q So, now, we have three either locations or
10 areas in addition to 2811.

11 Are there any others that you can remember as
12 we're sitting here?

13 A No.

14 Q Were there others that you just don't
15 remember?

16 MR. HANSEL: I'm going to object. I don't
17 know how he would know. Is there anything else
18 you remember? That's what he means, I think.

19 THE WITNESS: No.

20 BY MR. JEFFRIES:

21 Q Do you remember the name of the person

1 that you were seeing at Winchester Apartments?

2 **A Her name was Sheree.**

3 Q Do you remember her last name?

4 **A Fields.**

5 Q How about over on Tivoli?

6 **A Cupcake. I don't know her real name.**

7 Q How about near Harford?

8 **A That's the little girl. That's Dimples.**

9 Q Do you know Dimples' real name?

10 **A No. They don't get into giving names down**
11 **there.**

12 Q Do you remember how often you would stay
13 over with Dimples?

14 **A No. Probably a night or two.**

15 Q A night or two?

16 **A Yeah.**

17 Q Is that a night or two a week, or can you
18 tell me?

19 **A I'm not for sure.**

20 Q I'm sorry. I didn't hear you.

21 **A I'm not for sure. I know it was a night**

1 or two, if that.

2 Q How about Cupcake?

3 A Yeah. It wasn't no like I had no schedule
4 or nothing like that. It's just if I called you or
5 whatever, or you might call me, I might slide over
6 and chill with you. But other than that, no.

7 Q I'm not assuming it was a schedule. I'm
8 just trying to figure out. So, we're in February
9 of 14, how often might you be staying with Dimples
10 or with Cupcake? That's what I'm trying to figure
11 out.

12 A Okay.

13 Q Can you answer it any better than that?

14 A No. Just --

15 Q How about with Sheree? Did I say her name
16 correctly?

17 A Yeah. Sheree.

18 Q How often?

19 A Yeah. It wasn't no often. That's what
20 I'm trying to tell you. It wasn't no often. I mean
21 like --

1 Q Was it a night here, a night there?

2 A It might be. I don't know. It depends on
3 how I was feeling.

4 Q I can understand that. But you stayed
5 there a couple nights a week?

6 A Yeah.

7 Q Any other addresses that you can recall,
8 as we are sitting here now, in 2014?

9 A No.

10 Q The cell phone numbers that you had back
11 in 2014, do you recall those?

12 A No. I only had a few phone numbers. I
13 don't remember them.

14 Q Can you estimate for me how many you've
15 had?

16 A I don't know. Probably about two or
17 three, if that.

18 Q Two or three different phone numbers?

19 A Yeah.

20 Q Is that in 2014 or is that since 2014?

21 A I'm just saying, period. I'm not keeping

1 track of that. Like the number that I got now, I
2 might have had it for probably about a year now.
3 But I don't know.

4 Q So, let me see if I can sum it up. Let me
5 see if I'm following you.

6 Since 2014, you've had more than one cell phone
7 number, correct?

8 A Since 14?

9 Q Yes. sir.

10 A No.

11 Q You haven't had more than one cell phone
12 number since 14?

13 A No. Huh-uh.

14 Q What is your current cell phone number?

15 A Right now, as we're speaking?

16 Q Yes, sir.

17 A (410) 382-54 -- I mean, 5554. Excuse me.

18 Q That's okay. How long had you had that as
19 a cell phone number?

20 A Probably a year, if that.

21 Q And, so, we went backwards. So, what was

1 the cell phone number that you had before?

2 **A I ain't -- I don't know. I ain't keeping**
3 **track.**

4 **Q You don't know?**

5 **A No. I don't keep track of that.**

6 **Q But, obviously, it wasn't 382-5544?**

7 **A No.**

8 **Q How many cell phone numbers do you**
9 **remember having?**

10 **A I don't know.**

11 **Q Just the one? The only one you remember**
12 **is the one that you currently have?**

13 **A Yes.**

14 **Q As I was reviewing records to prepare for**
15 **this, I saw something sent relating you to Work**
16 **Force and Community Technology Center.**

17 Do you know what that is?

18 **A Yes. That's one of the programs that I**
19 **was in.**

20 **Q When were you enrolled in that program?**

21 **A I don't remember.**

1 Q Was it related to --

2 A As far as like it was helping you get a
3 job, getting -- not get a job, get like what you
4 just talking about as far as a trade. Meaning I
5 think, if I'm not mistaken, the Work Force
6 Technology Center basically helped you deal with
7 like BMWs, Mercedes, foreign cars, and I didn't
8 complete it.

9 Q Do you remember when you started it?

10 A No.

11 Q Was that something you were told to enroll
12 in?

13 A Don't get me to lying to you.

14 Q Was that a condition of being released at
15 some point?

16 A I don't think so. I think that was
17 something that my mother told me to go do, and that
18 was one of the things that I tried to go do that she
19 told me to go do.

20 Q Did you start that before being arrested
21 in 2014?

1 A I can't recall that. I think that did
2 happen before. Yeah, it had to.

3 Q Tell me why you say, "It had to?"

4 A Because that was something that I was -- I
5 guess, when I was trying to be productive. I don't
6 know. I don't know. I just know that was that
7 like -- that was before -- I think that was before
8 14. It had to be.

9 Q What do you remember about it other than
10 --

11 A I remember I got into it. I was it in
12 for, I think, either months or probably a year. I
13 don't know. I just know I gave up.

14 Q Was this a daily program? Was it an
15 educational program?

16 A It was trying to better me. I just told
17 you it was for my career, and I didn't go on with
18 it. I gave up.

19 Q And, again, I'm not judging what you did
20 or didn't do. I'm just trying to understand what
21 did you do in the program?

1 Do you remember anything specific about it?

2 A I can't remember. I just know that I was
3 in there, and I ain't do it. And my mother -- she's
4 still be talking about this to this day. Like "I
5 mapped a lot of stuff out for you, and you gave up."

6 Q And you told me, I think -- I just want to
7 make sure -- that you weren't working in 2014,
8 correct?

9 A No. I don't think I was working in no
10 2014.

11 Q I assume then your mother was the source
12 of support. Any other sources of support there?

13 A I just told you she was my backbone, Bro.

14 Q I understand that. But I'm asking you if
15 you had any other sources of support?

16 A No. My mother. I don't got nobody, Bro.
17 I got two brothers. I don't got no, Bro. I don't
18 have no sisters. Back on the topic, my mother.

19 Q Are you working now?

20 A You know, I ain't working, Bro.

21 Q When was the last time you were working?

1 **A I was working in the drug program.**

2 Q When were you there?

3 **A Probably like -- probably -- I'm going to**
4 **say probably like a year ago.**

5 Q A year ago?

6 **A And some months.**

7 Q And why did you leave that job?

8 **A I gave up.**

9 Q Were you fired or did you just stop
10 working?

11 **A I stopped going.**

12 Q Why did you stop going? You just stopped?

13 **A (The witness nods head up and down) .**

14 Q How about -- I'm going backwards to when
15 you were released, okay.

16 So, how long did you work in the drug program?

17 **A Almost two years and some months. Yeah,**
18 **and some months.**

19 Q And what were you doing there?

20 **A Mentoring people about getting high.**

21 Q Have you been a drug user historically?

1 **A I smoked smoke marijuana, yeah. So, I'm a**
2 **drug user.**

3 **Q Any substance other than marijuana?**

4 **A No.**

5 **Q Never?**

6 **A Ever.**

7 **Q Where did you work before that drug**
8 **program?**

9 **A McDonald's.**

10 **Q How long were you there?**

11 **A Some months. Some months.**

12 **Q Where was the McDonald's?**

13 **A Belair and Perryville, Northern Parkway**
14 **and Reisterstown, Cold Spring and Reisterstown, and**
15 **I think on North Avenue, if I'm not mistaken. But**
16 **I'm trying to think.**

17 **Q The first one you mentioned was Belair.**
18 **How long were you there?**

19 **A Belair -- say what? Say again.**

20 **Q How long were you working at that**
21 **location? Well, let me ask my question a little**

1 bit --

2 **A Probably like some months.**

3 Q Let me ask my question a little bit
4 differently.

5 So, what I'm asking you about is your jobs,
6 your employment since you were released back in
7 2019, okay. And you said --

8 **A Since 2019, probably off and on, I think a**
9 **couple of McDonald's jobs and a bakery one time and**
10 **the drug program.**

11 Q What's the name of the bakery?

12 **A Christi [phonetic] Bakery.**

13 Q How long did you work there?

14 **A Like a year, a year and some months.**

15 Q And why did you stop?

16 **A I stopped, I think cause I did go to the**
17 **drug program, but not in getting high. I started**
18 **working.**

19 Q Right. I thought I understood what you
20 said.

21 When you were released, where was the first

1 place that you went to work? So, when you were
2 released in 19, where was the first place you went
3 to work?

4 **A I think, if I'm not mistaken, McDonald's.**

5 Q And you worked at a number of locations;
6 is that fair?

7 **A Yes.**

8 Q And, again, I'm going 2019 forward, okay.
9 And you worked there for a number of months?

10 **A I worked there a couple of months, from 19**
11 **up now. I worked there a couple -- I worked at two**
12 **McDonald's, the one up on Northern Parkway and the**
13 **one on Cold Spring. And then I worked at the**
14 **bakery, and then I worked at the drug program.**
15 **They've been the only places of employment.**

16 Q Do you recall what you were earning at
17 McDonald's?

18 **A When I first started, probably minimum**
19 **wage.**

20 MR. JEFFRIES: Well, let me -- actually,
21 let me ask Counsel. Is he asserting a lost

1 wage claim?

2 MR. HANSEL: No.

3 MR. JEFFRIES: No, okay. Thank you. We
4 can get even closer --

5 THE WITNESS: Don't try and keep him
6 brief.

7 MR. HANSEL: You're doing great. You're
8 doing great. Let me explain to you just so you
9 know. I don't mind saying this in front of
10 everybody on the record.

11 He's asking about your employment history,
12 because if we were going to say you lost money from
13 employment, he needs to know all about that.
14 Instead, we have a pain and suffering claim for you,
15 based on the agony of what you went through
16 emotionally what happened.

17 And, so, because we're not going to say you
18 lost a particular dollar figure from being
19 incarcerated in wages, he's not going to hopefully
20 need as much of that information. That's what's
21 going on.

1 THE WITNESS: Sorry about that.

2 MR. JEFFRIES: No problem.

3 THE WITNESS: Sorry about that.

4 MR. HANSEL: No, no. You're doing great.

5 MR. JEFFRIES: You're doing fine. No need
6 to apologize. So, I have all of this.

7 BY MR. JEFFRIES:

8 Q Were you fired from any of the jobs that
9 you've held since you've been released in 2019?

10 A Not to my knowledge. Can I ask you a
11 question? Is being fired the same as you not coming
12 the next day? Or does that mean you quit?

13 Q Did you quit any of the jobs that you held
14 between 2019 and now?

15 MR. HANSEL: If there was somewhere you
16 just didn't show up the next day, you can tell
17 him that, and he can decide.

18 THE WITNESS: Yeah.

19 MR. HANSEL: You don't have to define it.

20 THE WITNESS: Yeah.

21 MR. HANSEL: Do you understand?

1 THE WITNESS: Yeah. I didn't show up,
2 man.

3 BY MR. JEFFRIES:

4 Q So, there wasn't a situation where, for
5 example, a supervisor said "you're fired, don't come
6 back tomorrow?"

7 A No. I'm going to be truthful to you.
8 Now, a supervisor told me this before, because I
9 came in there, and first, I kept calling -- I kept
10 calling, because they say, "No call, no show." That
11 means you're terminated. So, I kept calling, kept
12 calling. I guess, they was looking at the caller
13 ID, "Oh, this is Mr. Tim, he's trying to call, he's
14 trying to call out." They ain't answer the phone.

15 So, I go up there. "All right, sir, I
16 apologize. I need to go to the hospital, I'm under
17 the weather." He's like, "Look, sir, I ain't going
18 to lie to you. We need you, we need you to get on
19 this grill." I'm like "Man, I need to go to the
20 hospital, I ain't feeling too good." He's like,
21 "All right, we going to do it this way: You go into

1 the hospital -- boy, you go to the hospital, don't
2 even come back."

3 Now, if that's what you're saying, he said
4 that. And I'm like "I am going to the hospital, but
5 I'll to bring a doctors' note, and all that." And
6 he said I did that to myself.

7 Q What job was that?

8 A McDonald's.

9 Q And for the other positions, you just left
10 and didn't come back?

11 A (The witness nods head up and down).

12 Q Is that fair?

13 A Yes.

14 Q Other than this case, have you ever filed
15 another lawsuit or has a lawsuit been filed on your
16 behalf?

17 A Not that I know of.

18 Q Have you ever been sued? Has anybody
19 filed a lawsuit against you that you know of?

20 A No. Like I went to court, and they like
21 "you've been sued for X, Y, Z?"

1 Q Sure.

2 A No.

3 MR. JEFFRIES: I suppose I should mark
4 this.

5 (Exhibit No. 1 was subsequently marked for
6 identification and attached hereto).

7 BY MR. JEFFRIES:

8 Q Mr. Brown, I'm going to show you what's
9 been marked for the record as Exhibit 1. And I'll
10 represent to you that these are your answers to
11 interrogatories, to the interrogatories that were
12 compounded on behalf of Keith Gladstone.

13 If you look at the last page of the document.
14 They're double-sided, so if you just flip to the
15 back, you'll see -- all the way back.

16 A Yes, sir.

17 Q You will see a Docusign above your name.
18 Do you see that?

19 A Yes, sir.

20 Q Is that your electronic signature?

21 A Yes, sir.

1 Q Have you -- take your time and review this
2 now. I'm going to ask you first, I'm assuming
3 you've seen the document before. And then I have a
4 question about a specific answer, okay.

5 MR. HANSEL: Just answer as best you can.
6 Did you review it before you signed it is that
7 what he wants to know, really?

8 A No. I don't even remember hearing this.
9 I mean something about Timothy Brown's answers to
10 Defendant Gladstone. All right. So, I don't know
11 what that means.

12 Q Did you review -- not that exact piece of
13 paper --

14 A Oh, okay.

15 Q -- but did you review those answers before
16 you signed them back on October 31st of 2024?

17 A I'm not going to lie to you. Some of the
18 stuff that I did sign, I didn't sit there and go
19 exactly over like --

20 Q All right.

21 A Yeah. Some stuff, I didn't even read it.

1 Q Do you recall reviewing your answers to
2 Mr. Gladstone's interrogatories before you signed
3 them?

4 A No. I don't remember.

5 Q So, as we sit here, do you have any
6 recollection of reviewing them before you signed
7 them?

8 A No.

9 Q Look for me, please, at Answer Number
10 11 -- let me find the page. It's Page 8. So, if
11 you'll see on Page 8, you will see the Interrogatory
12 Number 11, and then you'll see the response. The
13 response is in bold.

14 Could you do me a favor and read both the
15 question and the answer to yourself and let me know
16 when you're done.

17 A The question and the answer?

18 Q Yes. Just read it to yourself and look up
19 and let me know when you're finished reading.

20 A The question?

21 Q The question being at the top of the page.

1 See where it says, "Interrogatory Number 11." It
2 says, "State whether." That's the question.

3 MR. HANSEL: Just read the whole page.

4 MR. JEFFRIES: Yeah. Just read the page.

5 MR. HANSEL: Is what he's saying, read the
6 whole page. And then let us know when you're
7 done, and take as much time as you need.

8 BY MR. JEFFRIES:

9 Q Are you finished reading it?

10 A Yes.

11 Q So, the question asks about arrests or
12 convictions, okay. And there's substantive response
13 there. So, my question to you, is that a complete
14 listing of the arrest and convictions?

15 MR. HANSEL: I'm going to object because
16 we objected in the questioning for the same
17 reasons, but go ahead.

18 MR. JEFFRIES: Sure.

19 MR. HANSEL: You can answer to the best of
20 your recollection.

21 THE WITNESS: Can you repeat it? Say it

1 one more time.

2 BY MR. JEFFRIES:

3 Q Sure. So, do you understand what the
4 question was?

5 A You said the question is.

6 Q Do you understand what the written
7 question was?

8 A Are you talking about up there?

9 Q Right.

10 A It says the question is have I been
11 arrested.

12 Q So, it's asking at any time during the
13 15-year period, preceding the day of your answers --
14 so, October 31st of 2024, have you been arrested for
15 or convicted of any crime, other than a minor
16 traffic offense?

17 A 2024?

18 Q Yes.

19 A I haven't been arrested -- I haven't been
20 arrested in some years.

21 Q Right. So, if 15 years, going backwards

1 from 2024.

2 **A So, that's 2011?**

3 Q It's 2009 really. And, so, and then you
4 see below, there's a response.

5 **A Right.**

6 Q And there's an objection from -- hold on.
7 There's an objection from your attorney, and then
8 there's a response. And it lists one -- five
9 separate incidents.

10 My question to you is, to the best of your
11 knowledge, is that listing complete or are there
12 other arrests or convictions?

13 MR. HANSEL: Objection. But go ahead.

14 **A No.**

15 Q No?

16 **A You say since 2024?**

17 Q No.

18 **A So, you're talking about inside this right
19 here, this bracket, is there any more charges?**

20 Q Yes.

21 **A Oh, I don't know. You just showed me**

1 **this.**

2 Q So, to be clear, these are your answers
3 that you signed. They're not mine. So, these are
4 the answers that you signed off on.

5 So, what I'm trying to figure out is if during
6 the 15 years before you signed these -- so, again,
7 2009 until 2024. What I'm trying to figure out is
8 were there any other arrests or convictions that you
9 did not list in Answer Number 11?

10 MR. HANSEL: Objection. But go ahead.

11 A **Not to my knowledge.**

12 Q This case arises because there was a
13 search warrant that was executed at 2811 Ruscombe,
14 right?

15 A **Yes.**

16 Q Do you recall when that was?

17 A **Not to my knowledge.**

18 Q I will represent to you that it was from
19 February 12th of 2014, okay?

20 A **(The witness nods head up and down) .**

21 Q You've got to answer verbally so the court

1 reporter can take it down.

2 A Oh, you said in February 14th, you say
3 what happened?

4 Q There was a search warrant -- there was a
5 warrant -- there was a search warrant executed at
6 2811 Ruscombe for the search of the property, right?

7 A Right. That's what I was told.

8 Q So, what do you remember that you did on
9 February 12th of 2014?

10 A I didn't do anything, not to my knowledge.
11 I don't remember doing nothing too much. But I went
12 to driving school. On my way to driving school -- I
13 didn't really do too much.

14 Q So, you recall on the 12th that you went
15 to driving school. Do you remember anything else?

16 A Yeah. I'm not going to say exactly on the
17 12th I went to driving school, but I know in that
18 little bracket, within January to February, I was in
19 driving school at that time. And it was a class
20 that you had to attend a couple days out of the
21 week.

1 Q Anything else that you remember that you
2 may have done on the 12th?

3 A No.

4 Q Where did you stay on the 11th?

5 A Don't get me lying to you. I ain't going
6 to lie to you. I don't even remember.

7 Q Do you know where you woke up on the 12th
8 in the morning?

9 A No.

10 Q Can you tell me the layout of Ruscombe?

11 A It got some houses.

12 Q Sure. But I'm asking -- I'm sorry. I'm
13 asking specifically about 2811, okay.

14 A It's a single home. It sit right here,
15 (indicating). It's got neighbors though, and my
16 mother's house, her fence, the neighbor's house
17 right next door.

18 Q How many bedrooms?

19 A Probably like two or three. Like two or
20 three.

21 Q A basement?

1 **A Yes. I think she got a basement and the**
2 **backyard.**

3 Q So, you walk in, and you're on the first
4 floor. You go up, there's a second floor. Is there
5 a third floor?

6 **A No. That's it.**

7 Q You walk in, you're on the first floor,
8 you go down, and you're in the basement?

9 **A Right.**

10 Q So, we have three floors total?

11 **A You can say that, yeah. No. You got the**
12 **second floor, first floor, and then the basement.**

13 Q Okay. Can you describe the layout? So,
14 if I walk in the front door, on the first floor,
15 what would I see, in terms of the layout?

16 **A I guess, living room, the hallway and the**
17 **kitchen, some steps to get upstairs.**

18 Q So, I'm walking through your front door.
19 I look to my right. What room am I -- what am I
20 looking at?

21 **A You go to the front door. If you look to**

1 **your right, you're looking at the steps. If you**
2 **look to your left, you're looking at a room. That's**
3 **the living room.**

4 Q And if you I look straight ahead, what do
5 I see?

6 A **That's her kitchen.**

7 Q Are there any other rooms on the first
8 floor?

9 A **Just the dining room. Kitchen, dining**
10 **room, living room. Nothing else.**

11 Q So, how -- if I'm, again, coming in the
12 first floor, looking straight ahead, I see your
13 kitchen, where is the dining room in relationship to
14 the kitchen?

15 A **Right besides the kitchen.**

16 Q To the right or to the left?

17 A **To your left.**

18 Q So, I would come in the first floor?

19 A **Look to your left, that's the living room.**
20 **Keep straight more, that's the kitchen. If you look**
21 **to your left more, that's the dining room. And**

1 **that's all there is.**

2 Q Got it.

3 A Dining room -- back door, dining room,
4 **kitchen, living room.**

5 Q Back door. Is the back door off the
6 kitchen?

7 A **Yeah.**

8 Q Can I get to the dining room from the
9 living room?

10 A **No.**

11 Q So, come in the first floor, go to my
12 right, there's steps. I go up the steps. What's up
13 there?

14 A My mother's room, my niece's room, my
15 **little brother's room.**

16 Q That's Trevor?

17 A **Right.**

18 Q Trevor Epperson, okay. And, so, again, I
19 go up the steps, if I look right, what do I see?

20 A **The window.**

21 Q So, how are the rooms oriented?

1 A This is the living room to your left. You
2 go to your right.

3 Q The second floor, I'm talking about.

4 A You go up the steps, my little brother's
5 room, my niece's room, my mother's room.

6 Q So, your mother's room at is at the back?

7 A Huh?

8 Q Is your mother's room at the back of the
9 house?

10 A No. I think my mother's room is in the
11 front.

12 Q So, your mother's room is in the front,
13 and is there a hallway?

14 A Yeah. The steps, you go up -- all of that
15 is the hallway. That's how you get up the steps.
16 You look to your left, you look right here, that's
17 her room, that's my little niece's room. And the
18 bathroom is right here, (indicating).

19 Q And then in the back, is that where you
20 brother's room is?

21 A No. As soon as you go up the steps, the

1 room right here, that's my little brother's room.

2 You look to your left, that's my mother's room. You
3 look to the right, that's my niece's room.

4 Q So, I go up the steps, I look in front of
5 me, that's your little brother's room?

6 A (The witness nods head up and down) .

7 Q Yes?

8 A Yes.

9 Q I look to my left --

10 A To the left, that's my mother's room. You
11 look to the right, that's my niece's room.

12 Q What's your niece's name?

13 A Her name is Bink. Real name is Bink.

14 Q Whose daughter is she?

15 A That's Trevor's daughter. But her real
16 name is April.

17 Q How old is she?

18 A Damn. I think like three or four,
19 something.

20 Q That's fine. I'm not going to tell.

21 A You already probably did.

1 Q No. I'm not going to say anything about
2 that.

3 A I think she's like four or five. I know
4 when her birthday is.

5 Q If it makes you feel better, when is her
6 birthday?

7 A The 31st of August.

8 Q Where do you stay in the house?

9 A I had a little on blow-up bed, and
10 sometimes I laid on the couch. But I didn't have no
11 room in there. I was the older one. So, I knew how
12 to move. I knew how to lay on the floor or lay on
13 the couch. Just haven't been.

14 Q So, let me ask my question a little bit
15 different then. I don't know. You tell me if it
16 changes --

17 A I didn't have a room in there. I slept on
18 the couch or I sleep on the floor with like some
19 blankets and a sheet.

20 Q So, let me walk backwards, because I want
21 to focus on 2014, okay?

1 **A Okay.**

2 **Q Did you have a room there in 2014?**

3 **A No.**

4 **Q You didn't? Where did you put your stuff?**

5 **A I had bags and clothes. That's when my**
6 **mother got mad, she used to say, "Pack your stuff**
7 **and get out."**

8 **Q Did you have clothes in there?**

9 **A Not for real. My stepfather really just**
10 **hung his stuff up in there.**

11 **Q What about -- you said "bags of clothes."**
12 **What about shoes or did you use any drawers or**
13 **dressers anything like that?**

14 **A No. I have a few clothes and bags. I**
15 **probably have one or two or three pairs of shoes.**

16 **Q So, you told me now your mom, your little**
17 **brother and your niece stay at 2811. Who stayed**
18 **there in 2014?**

19 **A I don't know. I was locked up.**

20 **Q Before you got locked up, who stayed there**
21 **in 2014?**

1 **A My little brother was there, my mother was**
2 **there, my stepfather was there, and I was there.**

3 **Q And your stepfather is Dennis; is that**
4 **correct?**

5 **A Yes, sir.**

6 **Q And did you have a room in 2014 before you**
7 **got locked up in 2011?**

8 **A No. I didn't have no room in there. I**
9 **told you. I had my stuff in bags. I laid on the**
10 **couch, or sometimes I'd sleep on the floor.**

11 **Q What was the room that your niece is now,**
12 **hat was that room being used for?**

13 **A Huh?**

14 **Q The room that your niece now stays in?**

15 **A She's been in there for like a minute.**
16 **They even had the room like when my son was**
17 **periodically in there, sometimes your family like --**
18 **I guess that's how my mother cared. I wasn't mad.**
19 **She gave me a place to live in there. Lay on the**
20 **couch or lay on the bed or lay on the chair or**
21 **whatever.**

1 Q Thank you. My question is a little bit
2 different. Back in 2014 --

3 A Yes.

4 Q -- February 1st, for example, all right,
5 your niece wasn't alive?

6 A No, she wasn't.

7 Q Right.

8 A But they already had -- like my son was
9 alive, and they already had stuff in there. They
10 already had my son's stuff in there.

11 Q I think you're anticipating my question,
12 but let me ask it to make sure.

13 So, who was staying -- who, if anybody, was
14 straying in the room, in the house where your niece
15 now stays, back in February of 2014?

16 A My son was in there. My mother had other
17 family members come there. At one point in time, my
18 uncle just was staying there.

19 Q What are your uncles' name? I know you
20 referred to one. But what are their names?

21 A My uncle, his name is was Elsworth, but we

1 **call him Rome.**

2 Q And what about your other uncle?

3 A **That's my Uncle Mang.**

4 Q I'm sorry. I didn't catch the name?

5 A **His name is Mang. One of the brother's**

6 **name is Elsworth, and the other one is name is**

7 **Jerome. But they got the same name. One name is**

8 **Elsworth Jerome. One of them is Jerome Elsworth.**

9 Q Those are your mother's brothers?

10 A **Yes.**

11 Q Your family, your little brother is Trevor

12 Epperson. Do you have an older brother -- do you

13 have an older or do you have another brother, you

14 told me?

15 A **I have a younger brother.**

16 Q What is his name?

17 A **Tylance Belton.**

18 Q Say that again for me?

19 A **Tylance Belton.**

20 Q Belton?

21 A **(The witness nods head up and down).**

1 Q Now, you weren't present when the house
2 was searched, right?

3 A Huh-uh. I was at driving school.

4 Q So, you weren't present when evidence was
5 seized, right?

6 A (The witness shakes head side to side).

7 Q Do you know when you would have last been
8 at 2811 before February 12th?

9 A No.

10 Q Do you know what was seized at 2811 when
11 they executed the search warrant?

12 A Not offhand, but when I got my charge
13 papers, they told me what was found in there.

14 Q What do you recall being told was found in
15 there?

16 A They said they found drugs, and they found
17 a firearm.

18 Q Do you know where those things were seized
19 from?

20 A No.

21 Q Do you know anything else that was seized?

1 **A No. Just drugs and a gun.**

2 Q And you were eventually charged with
3 crimes relating to the evidence at the scene, right?

4 **A Yeah. They put a warrant on me.**

5 Q Do you remember when you were arrested?

6 **A (The witness shakes head side to side).**

7 Q I'm assuming that's a no?

8 **A Fast.**

9 Q Do you remember the circumstances when you
10 were arrested?

11 **A No. I don't know anything.**

12 Q Do you remember what you were doing when
13 you were arrested?

14 **A No.**

15 Q Do you remember where you were?

16 **A No. Not to be truthful, for real. That**
17 **was like almost ten years ago.**

18 Q Do you know what you were arrested for?

19 **A What? What I got locked up for or what**
20 **the warrant was for?**

21 Q What you got locked up for.

1 A No. I ain't -- no. No. I think they --
2 I got locked up for nothing, no. They pulled me
3 over, and I guess the man looked at my face and was
4 like "we've got a warrant for you" and locked me up.

5 Q Do you remember why you were pulled over?

6 A No. Not for real.

7 Q Were you on parole or probation when you
8 were pulled over?

9 A Don't get me lying to, but probably so. I
10 don't know. Probably so though.

11 Q Now, ultimately you --

12 A Yeah. Yeah.

13 Q Go ahead. I heard you talking, but I
14 didn't hear what you said. What did you say?

15 A No. I was saying yeah, like I was still
16 agreeing with the other question that you said.

17 Q You were agreeing that you were probably
18 on parole or probation?

19 A Yeah. I was saying I probably was. I was
20 trying to think whether I was on probation. Yeah, I
21 was like yeah, probably so, yeah.

1 Q It's my understanding you pled guilty to
2 being in personal possession of a shotgun after
3 being convicted of a drug felony and possession with
4 intent to distribute heroine. Is that your
5 understanding?

6 A I guess.

7 Q I don't want you to guess.

8 A Yes. Yes.

9 Q And if it's not, I want you to tell me.
10 So, let me do it this way.

11 Do you recall pleading guilty in 2014?

12 A Yeah. I pleaded guilty to the Alford
13 plea.

14 Q You think you recall taking an Alford
15 plea?

16 A I really definitely remember taking an
17 Alford plea, meaning that I was saying that I wasn't
18 guilty. I just wanted the deal, so you wouldn't
19 lock my mother up. So, really, they said they
20 already locked up her up, but they was really trying
21 to --

1 Q You said they said about your mother. Who
2 said that about your mother, and what did they say?

3 A What do you mean? Who is "they?" Like
4 when I say "they," I mean, just in general, speaking
5 out loud.

6 Q Well, let's focus on what they said. What
7 did they say?

8 A Who are you talking about "they?" That's
9 what I'm saying. When I'm -- can you repeat the
10 question? I know you rephrased what I'm saying.
11 Because when I be like "they," yeah, it may means
12 more than one person but --

13 Q So, you entered into a deal --

14 A Right.

15 Q -- as a result of the charges --

16 A Right.

17 Q -- as a result of being charged in
18 February of 2014, correct?

19 A Right.

20 Q We'll talk about the substance of that
21 plea in a moment.

1 But when I asked you about it a minute ago, you
2 said something about somebody said your mother was
3 going to be locked up or something to that effect.
4 I'm asking you about that.

5 What is it that someone said to you?

6 A Okay. Well, one of my neighbors from
7 around there didn't call me or tell me, but I was
8 told that they caught my mother, because my mother
9 was at work. I was going to driving school. So,
10 somebody come around my mother, and the neighbor
11 called my mother and told her like "yeah, you know
12 they're at your house."

13 Q Who is the "they" that were at your house?

14 A I guess the police or whoever was at our
15 door, seeing that there was nobody there or
16 whatever. So, my mother came there or whatever.
17 Then my mother called me on the phone and was like
18 "you know the police here?" I'm like "all right,
19 what's wrong? What's going on?" She's like "yeah,
20 they said something about this, that and the other,
21 whatever or whatever." I'm like "well, I don't got

1 nothing. I don't know nothing about nothing in
2 there."

3 She's like "well, I'm just telling you they
4 said they're going to lock me up." I'm like "okay,
5 do you want me to come there?" She was like, "They
6 said it don't matter. I'm going to jail regardless
7 because it's my house. But they're still looking
8 for you, too."

9 Q Anything else with the conversation?

10 A No.

11 Q Now, you said the neighbor called your
12 mother. Do you know who the neighbor was?

13 A Not offhand. As a matter of fact, he's
14 dead.

15 Q Oh, okay. Do you know what his name was?

16 A We called him Bravo.

17 Q Bravo?

18 A Bravo.

19 Q Do you know where Bravo lived?

20 A He was one of my mother's neighbors.

21 Q Right. I know. Do you know the address?

1 **A No. Not offhand. I know it's 28**
2 **something.**

3 Q Do you know when your mom called you?

4 **A I guess while I was going on or whatever,**
5 **while I was on my way to driving school.**

6 Q Did any police officer have a conversation
7 with you about your entering into a plea?

8 **A (The witness shakes head side to side).**

9 Q No?

10 **A I never talked to nobody.**

11 Q Do you recall when you entered into this
12 plea in 2014?

13 **A I think it was like August the 9th.**

14 Q And you were represented by Counsel? You
15 had a lawyer?

16 **A No.**

17 Q You didn't have a lawyer?

18 **A A public defender.**

19 Q Yeah. So, you were represented by a
20 public defender?

21 **A That's not a lawyer. They not --**

1 Q Do you recall who the judge was?

2 A No, not offhand. That was years ago. I
3 bet you yours had a lawyer though.

4 Q Now, what you said you thought you entered
5 into an Alford plea? Is that what you said?

6 A Yeah.

7 Q What makes you say that?

8 A I thought that that's what the deal was,
9 meaning that I wasn't saying that I was guilty, but
10 I wanted what you all was offering. Because at
11 first, they offered me five, but then they took it
12 off the table. And then it turned into ten.

13 Q Do you recall the terms of the deal being
14 explained to you on the record when you entered your
15 plea?

16 A I think they did. I think -- I don't
17 remember. I think they did explain to you what you
18 was taking.

19 Q What else do you recall about that you
20 were entering into that plea?

21 A That was it. Not saying that I was

1 **guilty, but I wanted the deal.**

2 Q Do you recall admitting that you were
3 pleading guilty because you were guilty?

4 A **No. I was pleading guilty because I**
5 **wanted the deal, and they was talking about my**
6 **mother, too.**

7 Q What do you mean they were talking about
8 your mother? Who was the "they?"

9 A **My mother like -- they probably was**
10 **telling my mother like "all right, this is your**
11 **house, somebody got to take this charge."**

12 Q Who are the "they" -- okay. Is this a
13 conversation that you know occurred or is this
14 something that you're guessing?

15 A **No. I'm just -- I went off of I got to**
16 **help my mother.**

17 Q So, you're not saying that someone had
18 that type of conversation? You're guessing?

19 A **No. I ain't talked to nobody, because I**
20 **told you I didn't talk to nobody. But I'm just**
21 **going off hypothetically.**

1 Q So, you're guessing?

2 A Yeah. I'm like I'm getting my mother off
3 of this. Even if she -- whatever, it's my mother.
4 Got to help her.

5 Q As we sit here --

6 A Right or wrong, I don't care. I got to
7 help my mother. I ain't asking no questions.

8 Q So, as we sit here, do you recall
9 admitting that you were pleading guilty because you
10 were, in fact, guilty?

11 A You're saying --

12 Q As we sit here now, do you recall giving
13 that testimony during your plea?

14 A When you get a deal, they tell you. It
15 don't matter what you saying. Whatever they asking
16 you, you've got to agree with whatever they're
17 saying, even like if you don't feel like that's what
18 happened. But that was the deal.

19 Q I'm asking you if you recall --

20 A No. I don't recall.

21 (Exhibit No. 2 was subsequently marked for

1 identification and attached hereto).

2 BY MR. JEFFRIES:

3 Q Mr. Brown, I'm showing you what's been
4 marked as Exhibit 2.

5 A Yes, sir.

6 Q I will represent to you that that is a
7 transcript of your guilty plea. But go ahead,
8 please, and take a look at it, and let me know if
9 that refreshes your recollection about your plea.

10 You may take as much time as you need to read
11 it. As a matter of fact, if you want to take a
12 break, we can do that.

13 A So, pertaining to me reading the whole
14 thing, what is this?

15 Q So, I'm asking you if that refreshes your
16 recollection about what you said when you pled
17 guilty in August of 2014?

18 A I don't remember what I said, sir. I'm
19 not going to lie to you.

20 Q And that's what I'm saying. I'm
21 representing to you that is a transcript of the

1 proceeding.

2 You can go ahead and read it, and I'm asking
3 you if that will refresh your recollection of what
4 you said?

5 A So, what is the question? That's what I'm
6 asking. As far as if I do read this, and I get a
7 understanding, what is your question?

8 Q Well, one of the things I asked you is
9 whether you were pleading guilty, because you are,
10 in fact, guilty. And you said you didn't recall
11 answering that question.

12 Does that sort of summarize that correctly?

13 A I said as far as though I put in an Alford
14 plea.

15 Q So, let's look at Page 20. Do you see
16 where you were on Page 20?

17 A Absolutely.

18 Q And if you look on the left-hand side,
19 there's numbers?

20 A Correct.

21 Q So, let's go down to Page 20, Line 8.

1 A Answer, question.

2 Q Yeah. The question it says that you're
3 pleading guilty because you are, in fact, guilty; is
4 that correct? And then you see right below it on
5 Line 10 Answer --

6 A Right. But did you just hear what I said
7 to you before? When you take a plea, it don't
8 matter if you feel like -- you've got to say "yes,
9 yes, yes, yes" to everything that they saying or
10 you're not going to get the deal.

11 Q So, you did answer yes, you are pleading
12 guilty because you are, in fact, guilty? That was
13 your answer, correct?

14 A Yes. That's what I'm telling you, yeah.
15 It's saying right here. But that's what they do.
16 They tell you you have to fill in there -- they're
17 telling you like "all right, to take this deal, sir,
18 you're going to have to do blah, blah, blah, blah,
19 blah, blah, blah, blah, blah, blah." And the whole
20 time you're doing it, you've got to go with what
21 they're telling you to do.

1 Q And is this the transcript of the plea?

2 A Yes, sir.

3 Q Now, in your lawsuit, you're saying you
4 didn't commit these crimes; is that right?

5 A I'm saying I what?

6 Q In your lawsuit, the complaint that you
7 filed, you're saying that you didn't commit the
8 crimes for which you pled guilty; is that correct?

9 A No comment.

10 Q And that's not -- you have to answer that
11 question.

12 You filed a complaint. You pled guilty. You
13 served your time. You were released. You filed a
14 complaint, okay.

15 But in your complaint, you're saying you didn't
16 commit the crimes that you were charged with? Do I
17 have that correct?

18 A Yes.

19 Q What's your basis for saying that?

20 A Because I wasn't guilty. I was just
21 trying to get my mother out of something.

1 Q Why weren't you guilty?

2 A Because I didn't do no crime.

3 Q Okay. Can you explain that?

4 A As I told you, I didn't commit no crime,
5 but I wanted to help my mother.

6 Q So, you were charged with being in
7 possession of a shotgun after being convicted of a
8 drug felony.

9 What is your basis for saying that you didn't
10 commit that crime?

11 A I'm telling you that I didn't possess none
12 of that.

13 Q But there was a gun seized from 2811 --

14 A I didn't even -- huh?

15 Q There was a gun seized from 2811
16 Ruscombe Lane, right?

17 A That's what I was told.

18 Q You're saying it wasn't yours?

19 A None of it was mine. The drugs or the gun
20 wasn't mine.

21 Q Did you know that they were there?

1 **A No.**

2 **Q Are you disputing that they were there?**

3 **A I'm disputing that at the end of the day,**
4 **I was worried about my mother. Them people weren't**
5 **trying to head on nothing. They was trying to say**
6 **somebody was going to jail.**

7 **Q My question was a little bit different**
8 **though.**

9 Are you disputing that there was a shotgun in
10 that house?

11 **A I'm telling you I didn't know anything**
12 **about nothing was in the house, until somebody in my**
13 **papers state that they found gun and drugs.**

14 **Q Are you disputing whether there was a gun**
15 **in the house?**

16 MR. HANSEL: Objection. Asked and
17 answered. He said he wasn't aware of it until
18 he saw it in the papers.

19 **Q You can answer.**

20 **A I wasn't aware of it.**

21 **Q Are you disputing whether there were drugs**

1 found in the house?

2 A I'm disputing that I wasn't aware of
3 nothing. I wasn't there.

4 Q So, you're just saying you didn't know
5 they were there?

6 A I'm saying that there wasn't nothing in
7 that house. There wasn't nobody there. My mother
8 is a homeowner. She goes to work. All I know is my
9 mother -- you tell me like -- like I'm telling you
10 no, my mother, she ain't one of them.

11 Q I'm sorry. That doesn't my answer my --
12 my question is different.

13 A No. No. I'm telling you no.

14 Q No, what?

15 A I wasn't aware of nothing that was in the
16 house, sir. You're sitting here asking me, "well,
17 you didn't know that your mother" -- however, you
18 flip it, twist it or whatever, I'm telling you, I
19 didn't know there was no drugs in there. My mother
20 didn't have no drugs in there. My mother was at
21 work.

1 Q I wasn't asking about your mother.

2 A Okay, sir. No. I wasn't aware, sir.

3 Sorry.

4 Q It's okay. You talked to me about
5 speaking with your mother about a search warrant.

6 Did you speak with any other family members?

7 A No.

8 Q Were you are driving before you were --
9 were you driving during the time that you were
10 enrolled in driving school?

11 A No. I wasn't driving, but I had drove a
12 car, too. But that time, I wasn't driving.

13 Q What car had you driven?

14 A Don't get me be lying to you. I ain't
15 drove a few cars, cars that wasn't mine or cars that
16 was mine.

17 Q What about the cars that were yours?

18 A No. I wasn't driving at the time, sir.

19 Q Let the record reflect that Counsel is
20 towering over him.

21 A He's stretching his back.

1 MR. HANSEL: That's a joke. I'm
2 stretching my back.

3 (A discussion was held off the record).

4 BY MR. JEFFRIES:

5 Q Cars that were yours?

6 A I don't remember right this second, but I
7 had a few cars.

8 Q How about a Mercury?

9 A No. That wasn't my car.

10 Q Who's was that?

11 A My mother had multiple cars, but she let
12 us drive them.

13 Q So, was that Mercury your car?

14 A No. That wasn't my car.

15 Q Was it a car that you drove?

16 A No. I ain't drive that car.

17 Q You never drove that car?

18 A Never.

19 Q Was there a car on February, 2014 that you
20 regularly drove?

21 A I drove my mother's car.

1 Q What kind of car was that?

2 A I drove my uncle's. I drove my
3 stepfather's. I don't even remember what car my
4 mother had at that time.

5 Q But you drove your mother's car?

6 A I drove a few cars, yes.

7 Q Your mother's car is one of them, one of
8 the cars that you drove?

9 A Yes.

10 Q And then the other two, your stepfather;
11 is that what you're saying?

12 A Yes.

13 Q Do you know what kind of car that was?

14 A Like a Mercury or something, if I'm not
15 mistaken.

16 Q Do you recall what color it was, maybe?

17 A No. I ain't be lying to you.

18 Q And you mentioned your uncle's car, I
19 think. Is that the other one?

20 A I said I drove a few cars.

21 Q Right. You said your mom, and I think you

1 said "stepfather?" You did say "A few cars."

2 A Right.

3 Q Ad I think you said your uncle's car as
4 well. Did I misunderstand what you said?

5 A A few cars, sir. Mother's uncles,
6 brother's cousins. I drove a few cars, sir.

7 Q In 2014?

8 A In 2014, yes. I think I drove a few
9 people's cars, but I'm not -- I can't remember
10 exactly what cars.

11 Q I understand that you can't remember what
12 car. I'm asking if you can remember whose. And I'm
13 only focusing on 2014.

14 I thought I understand what you said is yes --

15 A I said I drove a few cars in February, 14.
16 I'm not going to sit right here and say, "oh, I
17 drove ten cars." I'm saying I drove multiple cars.
18 But in 14, I was getting on a bus. So, how I was
19 driving a car, sir?

20 Q We're talking over each other.

21 A Yes, sir.

1 Q Let me try and clear up my question.

2 A Right. You said my uncle's car?

3 Q I can't do that if you're repeating it.

4 Hang on. Let me ask my question again. I'm trying
5 to understand what cars you were driving in February
6 of 2014.

7 I believe you told me that you were driving
8 your mother's car; is that correct?

9 A Yes.

10 Q I believe you told me you were driving
11 your stepfather's car; is that correct?

12 A Yes.

13 Q And I think you told me you were driving
14 an uncle's car; is that correct?

15 A Yes.

16 Q Do you recall what kind of car your uncle
17 had at that point?

18 A I can recall in February, I didn't drive
19 too many people's cars. But I'm telling you I drove
20 a few people's cars in my life.

21 But in February -- I can't remember whose car I

1 was driving in February because I was getting into
2 the bus.

3 Q But you were driving people's cars in
4 February of 2014; is that fair?

5 A No. I'm not going to say -- I'm going to
6 say I drove probably my mother's car. I'm going to
7 say "A person's car or two." I'm not going to say
8 "people."

9 Q And you never had any contact with Keith
10 Gladstone, correct?

11 A With who?

12 Q Keith Gladstone. Do you know who that is?

13 A No.

14 Q No, you don't. Okay. So, you never
15 communicated with that person?

16 A (The witness shakes head side to side).

17 Q Is that a no?

18 A No.

19 Q Have you ever seen that person before?

20 MR. HANSEL: Well, objection. In
21 fairness, if he doesn't know who he is, he

1 wouldn't know if he had seen him.

2 BY MR. JEFFRIES:

3 Q So, you sued Mr. Gladstone. So, what are
4 you claiming that he's done in relation to your
5 case?

6 MR. HANSEL: Objection. That's a matter
7 for Counsel, but go ahead.

8 BY MR. JEFFRIES:

9 Q The facts -- what you claim factual --

10 MR. HANSEL: Same objection, but go ahead.

11 A Gladstone, I don't really know the guy.
12 So, he didn't do anything to me. Like physically --
13 no, he didn't do nothing like physically or like did
14 something to me, because I don't even know him. So,
15 no, he didn't.

16 Q Other than physically, what, if anything,
17 are you claiming that he did?

18 A I don't even know him. So, how could he
19 do anything to me?

20 Q I'm going to ask you the same set of
21 questions, different persons. I'm going to ask you

1 about Michael O'Sullivan.

2 A I never met none of them, sir.

3 Q So, do any of your answers change?

4 A My answer is I never met them. I never
5 seen them, like "hey, how you doing, O'Sullivan" or
6 gave them a five or nothing. I don't even know who
7 he is now. No, I'm not even going to try to go
8 through something like you just told me. No, I
9 don't know him. I don't know none of them.

10 Q So, same questions, different person,
11 Kenneth Patzman?

12 A I don't even know him.

13 Q So, same question, different person,
14 Avraham Tasher?

15 A I don't know none of these, sir.

16 Q Same question, different person, Antonio
17 Saunders?

18 A I don't know him. That's an officer?

19 Q It's one of the people you sued, yes, sir.

20 A I don't even know these people's names,
21 sir.

1 Q Go back for me to Exhibit Number 1, the
2 response.

3 A The response?

4 Q No. That's -- yeah. Look on your left
5 hand, I think.

6 A Right, this one?

7 Q Yes. I think so. Turn that over to the
8 other sticker on it. It says "1" at the top?

9 A Yes, sir. Sorry about that.

10 Q No. You're okay. Don't apologize. Let's
11 look at Page 9.

12 A Yes, sir.

13 Q And Response Number 15 down at the bottom
14 of the page.

15 Let me know when you had a chance, sir, to
16 review the question and the answer, okay?

17 A So, what's up with this?

18 Q So, you had a chance to read the question
19 and answer?

20 A Yes.

21 Q All right. The first sentence of the

1 question, it says, "Left the house to go to driving
2 school."

3 I'm correct that you don't know which house you
4 were staying and that you woke up at on
5 February 12th, 2014; is that correct?

6 **A I know where I was going at.**

7 **Q** I'm not asking where you were going.

8 **A Yes. Yes.**

9 **Q** My question is like you testified earlier,
10 I believe, when I asked you where "were when you
11 woke up, what was the address where you woke up," do
12 you remember that testimony?

13 **A Yeah. You asked me where I was staying**
14 **at. You said, "February" or something like that.**

15 **Q** No. I asked you specifically about
16 February 12th, and I said, "When you woke up, where
17 were you, what address were you at?"

18 Do you remember me asking that question?

19 **A No. I don't remember that.**

20 **Q** When you woke up on February 12th, what
21 address were you at?

1 **A I don't remember. I ain't going to lie to**
2 **you.**

3 Q From a factual standpoint, you are
4 claiming damages in this case.

5 So, I want to know, from a factual standpoint,
6 what are the damages that you're claiming?

7 MR. HANSEL: Objection. That's a matter
8 for the jury and for Counsel, but go ahead, to
9 the best of your understanding. And I will
10 tell you we're claiming everything available by
11 the law. But go ahead.

12 **A What you saying, as far as like what did**
13 **this do to me --**

14 Q Yes.

15 **A -- as far as like --**

16 Q What are you claiming -- yeah. What are
17 you claiming it did?

18 **A It took from my life. Like I'm not going**
19 **to make it like it's nobody in this room's fault or**
20 **nobody's fault but my own. But it messed me up**
21 **mentally. Like it scarred me. Like my son -- I'm**

1 not going to say that that's you all's fault, but
2 that played a big part. Them years I was gone out
3 of his life, he is scarred. My mother is scarred,
4 because she went through what she had to go through.
5 Like it didn't do anything to me physically, but,
6 mentally, emotionally, I'm scarred.

7 Q And that's what I'm asking you about. So,
8 you said, "I'm physically fine." Mentally,
9 emotionally, that's what I'm asking you.

10 So, just explain that to me. What are you
11 claiming happened?

12 MR. HANSEL: Same objection, but go ahead.

13 A I'm messed up. And I'm saying from this
14 situation, it really traumatized me, as far as like,
15 took my child from my life, as far as my mother.
16 Like this little situation, really, like it hurt me.
17 But I'm not going to sit right back and say all
18 right, I'm going to be one of these people that's
19 hurting and just go around and just spread it to
20 anybody else, no. I'm going to try some counseling.
21 I'm going to try to get some help. I know I'm not

1 going to be able to do this by myself.

2 Q Have you had counseling before?

3 A I ain't ever been through nothing like
4 this.

5 Q Have you sought any medical treatment as a
6 result of any of the injuries you're claiming here?

7 A Oh, I know I need help.

8 Q What have you done to get help?

9 A Nothing.

10 Q How long have you known that you needed
11 help?

12 A Since I came home and was really like not
13 just institutionalized, but just like how I move
14 now. Like I know I'm not going to be able to do
15 this by myself. You sit right here and watched me,
16 Bro, and like I'm messed up. And I'm not going to
17 sit here and say, from this situation, this is the
18 only thing that got me messed up. But it's a big
19 part of it.

20 Q Following up on that, what are the other
21 things?

1 **A What stuff are you talking about?**

2 **Q I was just following up on what you said.**

3 **You said this is a big part of what has got you**

4 **messed up. What are the other parts?**

5 **A As far as just life, dealing with**
6 **situations and don't know how to give my all.**

7 **Q You don't know how to give your all; is**
8 **that what you said?**

9 **A (The witness shakes head side to side).**

10 **Q Is that a yes? You have to say yes.**

11 **A Yes. Yes. Don't give my all, yes.**

12 **Q How long has that been going on?**

13 **A Me not giving my all, in a lot of years of**
14 **my life.**

15 **Q This was before 2014; is that fair?**

16 **A I'm going to say after 2014, it put a big**
17 **toll on me.**

18 **Q But it was going on before then, right?**

19 **A Not like -- not mentally like -- I**
20 **can't -- I'm trying to explain, but I can't.**

21 **Q Keep going.**

1 **A Yeah. It's messed me up.**

2 **Q You've been locked up before 2014, right?**

3 **A Yes.**

4 **Q What was the longest period of time before**
5 **you were locked up in 2014?**

6 **A A year.**

7 **Q A year. Where?**

8 **A They sent me all the way out to the new**
9 **jail with two years, and I had seven months on two**
10 **years. But because of not my security level, just**
11 **because they ain't have housing in the city, they**
12 **sent me all the way out there and sent me to a**
13 **pre-release spot. Like that wasn't no place where I**
14 **should have been sent at. I only had two major**
15 **incarcerations, that one for the month and this one**
16 **right here.**

17 **Q You used the word "major." What do you**
18 **mean by "major incarceration?"**

19 **A Major incarceration is something over, I'm**
20 **going to say months or a year. That's a major**
21 **incarceration. Like you can get two to three years,**

1 and that's a major incarceration.

2 Q How many other incarcerations have you
3 had?

4 A I only had one, this situation and the
5 other one. And I got two years for that one, but I
6 had like seven months. And they gave me some
7 suspended time, but I did a couple months up on the
8 hill and came straight home. Like I ain't even
9 supposed to went on to Hagerstown for two years.
10 They was supposed to send me to a pre-release spot
11 in Baltimore. But the system is so messed up, and
12 they wanted the conviction on somebody's record or a
13 big one like that for two years. And I had seven
14 months in, and they sent me all the way out to the
15 new jail.

16 MR. JEFFRIES: I'm about done, I think.

17 Let's take a break, and let me make sure.

18 (A brief recess was taken).

19 MR. JEFFRIES: And, Mr. Brown, those are
20 all the questions that I have for you. Thank
21 you.

EXAMINATION

BY MS. MARQUEZ:

Q Mr. Brown, it's nice to finally get to speak with you. My name is Sabrina Marquez. I represent the defendant named Robert Hankard in this case.

I'm going to ask you a few questions, and then hopefully everyone will be able to get home with their Friday. So, I will do my best to be brief.

A Yes.

Q Now, I mentioned that the individual that I represent is Robert Hankard. Do you know who that is?

A No.

Q Have you ever met him?

A No.

Q Do you know what you're claiming in your lawsuit that he did?

A As far as the mental and as far as like what they told that he did to me as far as like what happened?

1 Q Yes. Anything that you're claiming that
2 Robert Hankard specifically did to you that
3 caused --

4 A He didn't specifically do anything to me
5 physically or like anything like that. But as far
6 as like the situation, it messed me up as far as
7 mentally. Like a lot of times like I'll be having
8 to sit down and just try to get myself together
9 because I start worrying and start like -- I'm a
10 little messed up in the head.

11 Q Now, you indicated that you were not home
12 the day the search warrant was executed?

13 A No, ma'am.

14 Q Was anyone home, to your knowledge?

15 A No, ma'am.

16 Q And you mentioned that your mother was at
17 work; is that right?

18 A My mother was at work. I was on my way to
19 driving school. I'm not for sure where my little
20 brother or nobody was at, but there wasn't anybody
21 at home.

1 Q So, you didn't know where your stepfather
2 was either?

3 A He was at work.

4 Q And your mother was working at McDonald's?

5 A Yes. Yes, ma'am.

6 Q Do you know where your stepfather was
7 working at the time?

8 A Christi Bakery. He had been at the bakery
9 for 17 years.

10 Q Does he still work there now?

11 A No. He works at Coca Cola now. It's been
12 a while my mother was married.

13 Q And you indicated you were on your way to
14 driving school.

15 Do you remember what time driving school
16 started approximately?

17 A I'm not for sure.

18 Q And how did you typically get to driving
19 school?

20 A Get on the bus.

21 Q And before -- so, back in 2013, when you

1 were working at McDonald's, how did you typically
2 get to work?

3 A Either I ask a person to drop me off, get
4 on the bus. Just the norm, how a person get around
5 in the real world.

6 Q And that driving school was to get your
7 regular driver's license, correct?

8 A My learner's permit.

9 Q Your learners permit. Got you. Have you
10 ever been gone to driving school to get a commercial
11 driver's license?

12 A No. But on the job that I was working at,
13 the drug program, they were funding -- at a certain
14 specific time in the time frame, they were funding
15 people that wanted to take the CDL classes, because
16 you can't just go get your CDL license. You've got
17 to take classes. I think it's a certificate or
18 something or whatever. There's a few things you
19 have to do before you can just get your CDL license.

20 Q And that drug treatment program was around
21 2023, is when you were working there?

1 **A Yes.**

2 Q So, you didn't try to get your CDL before
3 that time?

4 **A No. I wasn't working anywhere. I was**
5 **going to school there, driving school.**

6 Q And, now, I'd like to you ask you a couple
7 of questions about your incarceration from 2014 to
8 2019.

9 During that time period, how many facilities
10 were you at?

11 **A Two.**

12 Q Two. Do you recall what they were called?

13 **A Roxbury, RCI, and then they sent me to the**
14 **pre-release spot that I was telling you about.**

15 Q Do you recall what it was called?

16 **A It was called Dorsey Run.**

17 Q Dorsey Run. Were you at Roxbury first?

18 **A Yes.**

19 Q Do you know what time or what time frame
20 you were transferred from Roxbury to Dorsey?

21 **A It was in the time frame of 2014. I know**

1 I got locked up within whatever time -- I think I
2 got locked up -- I went to jail fast, as a matter of
3 fact. That shit happened in February, and I was
4 locked up in March.

5 Q You were at Roxbury in March?

6 A No. I was down in the steel side for some
7 months until like August, and then that's when I got
8 my time or whatever, I got the time. And then they
9 shipped me out to RCI in like August -- yeah, like
10 August or September.

11 Q August or September of 2014, you went to
12 Roxbury. Do you know when you were transferred from
13 Roxbury to Dorsey Run?

14 A After I gave them probably like almost
15 five years. And then I went from medium security to
16 minimum, and they sent me to Dorsey Run. And then I
17 sat down at Dorsey Run for some months. And then
18 went home from there, Dorsey Run.

19 Q So, you were only at Dorsey Run for a
20 couple of months before you were released?

21 A Yes. Some months, yeah. No. No. Yeah.

1 I think I went out Dorsey Run from like 18, and
2 stayed from Dorsey Run from like 18 to 19, if I'm
3 not mistaken. Don't get me to lying to you. That's
4 lying.

5 Q That you were there from 2018 to 2019?

6 A I bet it was like -- I think -- yeah. I
7 think it was like -- yeah. I think I stayed at
8 Dorsey Run for like a year, like a year and some
9 change for real, yeah.

10 Q Now, let's go back to your time at
11 Roxbury.

12 A From?

13 Q 2014 to about 2018 --

14 A Yeah.

15 Q While you were there, did you use the
16 facility telephone to make phone calls to the
17 outside?

18 A Sometimes.

19 Q And while you were at Roxbury, did you
20 have any disciplinary infractions?

21 A I think so. I think I went on lock

1 probably one time out of my whole bit.

2 Q Can you tell me what happened?

3 A I was in the cell with somebody, and they
4 searched the cell. And they felt something under my
5 bunk buddy's bed. But when they do that, even if
6 you go in there and be like, "sir, I don't know
7 nothing about nothing," they still book you up on a
8 lock-up. I went on lock-up for that. I went out
9 for the ticket, and they closed it out. I didn't
10 get no time or nothing because I was not guilty.

11 Q Do you recall what was found in the cell
12 when it was searched?

13 A No. Not to my knowledge.

14 Q And you said with that ticket, there was
15 no time added or time lost?

16 A No. Because I ain't get found guilty for
17 it, because my bunk buddy went in there and said he
18 don't know nothing about nothing. He just was
19 sleeping in there. And he took his charge, I guess.

20 Q Were there any instances where good time
21 was taken away as a punishment?

1 A Don't get me lying to you. I don't know.
2 But nine times out of ten, they do try to take --
3 they take good days and all that. but I ain't messed
4 up. As a matter of fact, I didn't lose none of my
5 days -- I think I did lose some good days, but they
6 gave them back to me.

7 Q Do you recall why?

8 A No. I ain't for sure. Don't get me lying
9 to you. But, no, because I made parole and all
10 that.

11 Q And while you were at Roxbury,
12 specifically from 2014 to 2018, did you get in any
13 physical altercations with any other inmates?

14 A Yeah. I think I probably got in a fight
15 or two.

16 Q Do you recall any details about it?

17 A I'm not for sure. I know that whole five
18 years wasn't just no walk in the park. I know that.

19 Q Can you tell me a little bit more about
20 that, what your experience was like?

21 A Just sitting there with people that just,

1 **I guess, messed up in life. I don't know.**

2 Q Did you ever have any physical
3 altercations with any correctional officers while
4 you were at Roxbury?

5 A **Huh-uh.**

6 Q Were there any significant events while
7 you were at Roxbury?

8 A **Like as far as pertaining to what? Can**
9 **you elaborate?**

10 Q Any incidents with maybe the living
11 quarters? Did the power ever go out? Was the AC
12 ever off? Any significant events like that?

13 A **I guess. Don't get me lying to you.**

14 Q Do you recall any?

15 A **No. I don't recall.**

16 Q Did you have any significant medical
17 events while you were at Roxbury?

18 A **As far as like I was on medication or**
19 **something?**

20 Q Did you have to be rushed to the medical
21 wing? Ever have to go seek emergency medical care

1 while you were at Roxbury?

2 A Not to my knowledge. I don't think. I
3 don't think nobody did nothing to hurt me or
4 nothing, I don't think.

5 Q And I'm going to run through the same
6 questions with you when you were at Dorsey Run
7 first. So, we're talking now about 2018 and 2019.

8 A I ain't get in no trouble down there,
9 because I was trying to come home.

10 Q So, no physical altercations while you
11 were at Dorsey Run?

12 A No. I ain't get nothing down there. As a
13 matter of fact, I had a job and all that.

14 Q What job did you have?

15 A I was working at -- they had me working --
16 I was working in the kitchen. Then I was trying to
17 get the -- because they give you a worker's permit,
18 meaning that you can go out in the real world and
19 work and get a pay check and all that. I was trying
20 to get one of them jobs, but they just kept me in
21 the building, for real.

1 Q So, you were working in the kitchen --

2 A Right.

3 Q -- at Dorsey Run, and they sometimes give
4 a certificate. Did you ever get that certificate?

5 A I didn't receive the certificate. But it
6 wasn't like a certificate. Like certain people,
7 like if you pre-release, you get a worker's, like a
8 little permit saying that you can go and go to work
9 and you've got to be back in the house -- be back in
10 there a certain time. Like you pay dues and all
11 that. Like they was paying. I could never got that
12 job though.

13 Q No disciplinary actions while you were at
14 Dorsey Run?

15 A No. Not to my knowledge.

16 Q Any altercations with a security guard or
17 a correctional officer?

18 A Not to my knowledge.

19 Q No significant medical events?

20 A Yeah. Man, I was chill. I was trying to
21 come home.

1 Q Returning back briefly to Roxbury, you got
2 in a couple of fights.

3 Any other violent interactions with another
4 inmate?

5 A (The witness shakes head side to side).

6 MR. HANSEL: Is that a no?

7 A No. I didn't get in no fights. I think I
8 got in one fight. I didn't really get in too much
9 stuff out there. I got a lock-up that one time from
10 my cell buddy. I beat that ticket. And then I
11 think I got in a fight, and then that was it.

12 Q No other inmate -- you said no other
13 inmates physically harmed you in any way?

14 A No.

15 Q Is there any mistreatment from any
16 correctional officers?

17 A No. Because, really, I was trying to go
18 home. Like when you're out there, they take time
19 and stuff from you. Like they make you do a whole
20 other bit.

21 MS. MARQUEZ: I think those are all of my

1 questions. Thank you very much, Mr. Brown.

2 THE WITNESS: Sorry about that.

3 MR. HANSEL: Do you have any follow-up on
4 that?

5 MR. JEFFRIES: I'll go after you, if I
6 have any.

7 MR. HANSEL: Let me just ask you a few
8 questions, Mr. Brown.

9 EXAMINATION

10 BY MR. HANSEL:

11 Q You were asked about conversations you had
12 with your mother and with the police.

13 Did you have any conversations with anybody
14 else about this concern that you raised about any
15 indications that the police would lock up your mom
16 if you didn't plead.

17 Did you talk about that with anybody in the
18 neighborhood?

19 A No.

20 Q Anybody? Friends? Any family?

21 A No.

1 Q So, who did you hear that from?

2 MR. JEFFRIES: Objection to form.

3 Q In other words, from whom -- you said
4 there was a concern that if you didn't plead, your
5 mom would get locked up for these charges.

6 Who did you hear that from is my question?

7 A Just as far as like a few people that I
8 know, family members and stuff like that.

9 Q Do you remember the names of any of the
10 people?

11 A No. I don't remember exactly what names.

12 Q Did they tell you where they learned that
13 information?

14 A No. They really don't tell you.

15 Q There was a claim that there were drugs
16 and guns in this property.

17 Did you have any guns and drugs in this
18 property?

19 A No.

20 Q Did you ever see guns and drugs in this
21 property?

1 **A No.**

2 Q You were asked about a bunch of officers
3 by name, Gladstone, O'Sullivan, Patzman, Tasher,
4 Saunders, Hankard.

5 Do you recall being asked those questions?

6 **A No.**

7 Q You said they hadn't done anything
8 physical to you, but in your answer, you mentioned
9 the situation.

10 What's the situation you were talking about?

11 **A As far as like them planting stuff, them**
12 **taking me away from my family, them putting my**
13 **mother in a situation where she have be looking**
14 **around type stuff. She go to work every day. She's**
15 **a homeowner. She don't break no law. She's a**
16 **law-abiding citizen. She pays taxes and all that.**

17 Q You were asked about whether you sought
18 any counseling. Do you have money for counseling?

19 **A No.**

20 Q Do you have any other means of paying for
21 counseling?

1 **A No.**

2 **Q Do you feel that you need some kind of**
3 **help or counseling?**

4 **A Yes.**

5 MR. HANSEL: That's it. I don't have
6 anything else.

7 MR. JEFFRIES: Excuse me, Mr. Brown.

8 EXAMINATION

9 BY MR. JEFFRIES:

10 **Q In answer to the question from Counsel,**
11 **you mentioned planting stuff. Do you recall saying**
12 **that?**

13 **A Yes.**

14 **Q What are you talking about?**

15 **A As far as like planting stuff, meaning**
16 **like evidence stuff that can basically be**
17 **devastating to whoever the person is or whatever the**
18 **situation is.**

19 **Q Are you claiming that something was**
20 **planted in this case?**

21 **A I know for a fact something was planted in**

1 there, because my mother don't break no law. I
2 wasn't breaking no law. I was trying to be in my
3 son's life, going to driving school. My mother used
4 to tell me -- she like "look, you keep on jumping
5 behind my steering wheel. So, you keep on asking a
6 person let you hold their car. You're not insured,
7 you don't have nothing." She's like, "Yeah, you
8 live under this house. Yeah, they pull it up, and
9 they say, "yeah, this car belong to such and such."

10 But she like "you get in an accident, you're
11 going to be looking crazy. She like "go get your
12 license, Bro." She said, "I will pay for it for
13 you, since you're sitting right here saying" --
14 she's like "go get your driver's license, I will pay
15 for it."

16 Q Is there any other -- what else are you
17 relying on, anything else to say that something was
18 planted in this case?

19 MR. HANSEL: Objection. But go ahead.

20 A No.

21 Q That's it?

1 MR. HANSEL: Same objection. Go ahead.

2 A No.

3 Q What are you claiming was planted?

4 A Whatever they retrieved out of that home,
5 they planted in that house. I know for a fact, I
6 didn't put nothing in there. I know my mother
7 didn't put nothing in there. They the only ones
8 that was in that house.

9 Q Do you know whether any of that evidence
10 was in the house? You said you knew it wasn't
11 yours, and you knew it wasn't your mother's?

12 A No. What I was informed was I was on my
13 way to driving school. My mother was at work.
14 There wasn't nobody home. My mom called me like,
15 you know, "Bob was letting me know that the police
16 is at my house right now." I'm like "all right.
17 So, what do you want me to do, Mom? You know, I'm
18 up at driving school. Well, I'm going to call you,
19 because they're telling me right now they're locking
20 me up. What would they be locking you up for?" She
21 goes, "I don't know what's going on but just" -- and

1 **hung the phone up. I'm like cool. I waited for**
2 **her. She never called me.**

3 Q Do you have any other basis for saying
4 that anything was planted in that house?

5 MR. HANSEL: Objection. Go ahead.

6 **A You say do I know?**

7 Q I said, "Do you have any other basis for
8 your claim that anything was planted at the house
9 that you haven't already told me?"

10 MR. HANSEL: Objection. But go ahead.

11 THE WITNESS: No.

12 MR. JEFFRIES: No, okay. Those are my
13 questions.

14 MS. MARQUEZ: I have just a couple more.

15 EXAMINATION

16 BY MS. MARQUEZ:

17 Q When you were talking about the phone call
18 from your mother, did you use the name Squint? Did
19 I hear that right?

20 **A Yes. Yeah. My name is Tim, but some**
21 **people say "Squint." Some people call "Squid," some**

1 **people "Squirt."**

2 Q Any other --

3 A **No. My name is Tim though. No nicknames.**

4 Q Have you ever gone by the nickname SQ?

5 Has anybody called you SQ?

6 A **I don't even know what "SQ" is.**

7 Q And do you know an individual named

8 Christian Smith?

9 A **Huh-uh.**

10 Q Is that a no?

11 A **No. Is that a female or a man?**

12 Q I presume it is a man, but I could not say

13 for sure.

14 A **I don't know that person, whoever that is.**

15 MS. MARQUEZ: Those are all my questions.

16 THE WITNESS: You say, "That's a woman or

17 a man?"

18 MS. MARQUEZ: The name is Christian. Do

19 with that what you will.

20 MR. HANSEL: That's it. We'll read and

21 sign. Thank you all.

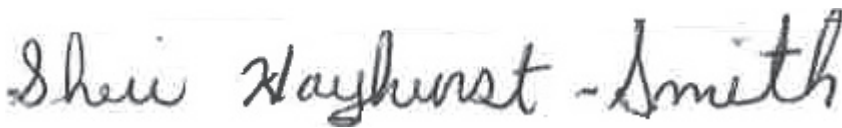
1 (Signature having not been waived, the
2 deposition of Timothy Brown, Jr. was concluded at
3 3:29 p.m.)
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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Sheri Hayhurst-Smith, Court Reporter, the
3 officer before whom the foregoing deposition was
4 taken, do hereby certify that the foregoing
5 transcript is a true and correct record the
6 testimony given; that said testimony was taken by me
7 stenographically and thereafter reduced to
8 typewriting under my direction and that I am neither
9 counsel for, related to, nor employed by any of the
10 parties to this case and have no interest, financial
11 or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my
13 hand and affixed my notarial seal this 5th day of
14 June, 2025.

15 My commission expires November 4, 2028.

16
17 
18 _____

19 COURT REPORTER

20 NOTARY PUBLIC FOR THE STATE OF MARYLAND

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E R R A T A S H E E T

IN RE: Timothy Brown v. Mayor and City Council of
Baltimore City, et al.

WITNESS: TIMOTHY BROWN, JR.

1 ACKNOWLEDGMENT OF DEPONENT

2
3 I, Timothy Brown, Jr., do hereby acknowledge
4 that I have read and examined the foregoing testimony,
5 and the same is a true, correct and complete
6 transcription of the testimony given by me, and any
7 corrections appear on the attached Errata sheet signed
8 by me.
9
10
11
12

13 _____
14 Timothy Brown, Jr.
15

16 _____
17 Date
18
19
20
21

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